

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

WES FORD,

Defendant.

Case No. 3:16-cr-012-LRH-WGC

**STIPULATION REGARDING
TIMING OF DISCLOSURE UNDER
FEDERAL RULE OF EVIDENCE
404(B) AND ORDER THEREON**

Federal Rule of Evidence 404(b) provides that “upon request by the accused, the prosecution in a criminal case shall provide reasonable notice in advance of trial, or during trial if the court excuses pretrial notice on good cause shown, of the general nature of any [Federal Rule of Evidence 404(b) evidence] it intends to introduce at trial. Fed. R. Evid 404(b). What is “reasonable notice in advance of trial” depends upon the individual case.

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and MEGAN RACHOW, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and LAUREN D. GORMAN, Assistant Federal Public Defender, counsel for WES FORD, that on or before April 14, 2017, the Government will provide notice of the general nature of any evidence under

1 Rule 404(b) of other crimes, wrongs, or acts which it deems admissible for purposes of proof
2 of motive, opportunity, intent, preparation, plan, knowledge, identity, or absence of mistake or
3 accident. The parties further stipulate that they have conferred and agree that disclosure of
4 404(b) evidence on or before April 14, 2017 constitutes reasonable notice in light of the facts
5 and circumstances of this case and that such notice would provide for timely research,
6 investigation and filing of motions in limine regarding the admissibility of 404(b) evidence.

7 DATED this 13th day of January, 2017.

8 RENE L. VALLADARES
9 Federal Public Defender

DANIEL G. BOGDEN
United States Attorney


10 /s/ Lauren D. Gorman
11 By LAUREN D. GORMAN
12 Assistant Federal Public Defender

/s/ Megan Rachow
By MEGAN RACHOW
Assistant United States Attorney

ORDER

IT IS ORDERED that on or before April 14, 2017, the Government will provide notice of the general nature of any evidence under Rule 404(b) of other crimes, wrongs, or acts which it deems admissible for purposes of proof of motive, opportunity, intent, preparation, plan, knowledge, identity, or absence of mistake or accident.

DATED this 17th day of January 2017.



LARRY R. HICKS
UNITED STATES DISTRICT JUDGE